

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

In re:	:	Chapter 11
	:	
OKLAHOMA FORGE, LLC d/b/a	:	Case No. 24-11060-M
OKLAHOMA FORGE, INC.,	:	
	:	
Debtor.	:	
	:	

**ELLWOOD NATIONAL STEEL COMPANY,  
ELLWOOD QUALITY STEELS COMPANY, AND ELLWOOD GROUP INC'S  
WITNESS AND EXHIBIT LIST FOR HEARING ON FEBRUARY 20, 2025**

Ellwood National Steel Company (“ENS”), Ellwood Quality Steels Company (“EQS”), and Ellwood Group, Inc. (“EGI”) (EQS, ENS, and EGI are collectively the “Ellwood Companies”) files this witness and exhibit list (the “Witness and Exhibit List”) in connection with the hearing to be held on **February 20, 2024, at 1:30 p.m. (CT)** (the “Sale Hearing”) on *Debtor’s Motion for an Order (1) Authorizing Sale of Substantially All of the Debtor’s Assets Free and Clear of All Liens, Claims, and Encumbrances and Other Interests, (2) Approving Distribution of Sale Proceeds, and (3) Granting Related Relief* [Docket No. 122] in the above-captioned chapter 11 case.

**WITNESSES**

The Ellwood Companies may call the following witnesses at the hearing:

1. James J. Connor;
2. David R. Payne;
3. A representative of Ellwood Companies;
4. Any witness designated or called by any other party;
5. Any impeachment or rebuttal witness; and
6. The Ellwood Companies reserves the right to cross-examine any witness called by any other party.

## **EXHIBITS**

The Ellwood Companies designate the following exhibits that may be used at the Sale Hearing.

<b>Exhibit No.</b>	<b>Description</b>	<b>Off.</b>	<b>Obj.</b>	<b>Adm.</b>
<b>1</b>	Bid Letter and Asset Purchase Agreement dated February 13, 2025, between Oklahoma Forge, LLC and TSK Partners, LLC d/b/a McInnes Rolled Rings [ECF No 205, Exhibit 2].			
<b>2</b>	Amended and Restated Security Agreement dated September 15, 2023, between Oklahoma Forge, LLC and Loeb Term Solutions LLC [Proof of Claim 20-2].			
<b>3</b>	Final Order (I) Authorizing Post-Petition Credit, (II) Granting Senior Secured Liens and Superpriority Claims Under Sections 364(C) and (D) of the Bankruptcy Code, (III) Granting Adequate Protection Liens, and (IV) Granting Related Relief [ECF No 139].			
<b>4</b>	Lease Agreement dated June 13, 2023, between Oklahoma Forge, LLC and Store Master Funding, XIV, LLC [ECF No. 135, Exhibit A].			
<b>5</b>	Landlord Access Agreement dated September 15, 2023, between Store Master Funding XIV, LLC and Loeb Term Solutions LLC			
	All exhibits presented or designated by any other party.			
	All exhibits necessary to rebut any exhibit presented or designated by any other party.			
	Any pleadings, reports, or other documents filed in the above-referenced bankruptcy case and any adversary or appeal related to the foregoing bankruptcy case, and any transcripts in any such case.			

## **RESERVATION OF RIGHTS**

The Ellwood Companies reserve the right to amend or supplement this Witness and Exhibit List at any time prior to the Sale Hearing and/or in compliance with the Local Bankruptcy Rules

and the orders of this Court. The Ellwood Companies further reserve the right to provide any documents amended or supplemented in this Witness and Exhibit List to opposing counsel and to this Court as they become available.

Dated: February 17, 2025

Respectfully submitted,

/s/ Michael A Shiner

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